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Counsel for Defendant RAVEN  
Specially Appearing for Defendant BLAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Patrice RAVEN and Jeanette  
BLAND,

Defendants.

No. CR-07-70489 MAG

MOTION AND [PROPOSED] ORDER  
FOR TEMPORARY MODIFICATION  
OF BAIL CONDITIONS PERMITTING  
DEFENDANTS TO TRAVEL TO LAW  
VEGAS

Next Date: October 31, 2007 (Judge  
Chen)  
Time: 9:30 a.m.  
Court: Honorable Joseph C. Spero

Defendants Raven and Bland hereby respectfully request this Court to issue an order modifying their bail conditions, which would permit the defendants to travel to Las Vegas for plans they arranged prior to their arrests on this matter. The proposed dates of travel are November 1, 2007 through November 4, 2007. United States Pretrial Services Officer Hence Williams has been contacted by defense counsel about this request, and has no objection to the request. USPSO Williams will be provided with an itinerary detailing flight and hotel information. The defendants will be back in the district no later than the evening of November 4, 2007.

Assistant United States Attorney Allison Marston Danner has been contacted by defense

1 counsel, and has no objection to the request.

2 WHEREFORE, defendants Raven and Bland respectfully request this Court to grant the  
3 temporary modification, and allow the defendants to travel to Las Vegas between November 1, 2007  
4 and November 4, 2007.

5  
6 IT IS SO STIPULATED

7 DATED: 10/22/07

/S/  
ELIZABETH M. FALK  
Assistant Federal Public Defender

9  
10 DATED: 10/22/07

/S/  
ALLISON MARSTON DANNER  
Assistant United States Attorney

11  
12  
13 **[PROPOSED] ORDER**  
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15 GOOD CAUSE SHOWN, it is hereby ORDERED that the bail conditions of Defendants  
16 PATRICE RAVEN and JEANETTE BLAND be temporarily modified to permit them to travel to  
17 Las Vegas on Thursday, November 1, 2007, provided that the defendants return to the Northern  
18 District of California no later than the evening of November 4, 2007.  
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21 THE HONORABLE JOSEPH C. SPERO  
22 UNITED STATES MAGISTRATE JUDGE  
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